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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

STIPULATION AND ~~[PROPOSED]~~
ORDER REQUESTING ADDITIONAL
TIME FOR COMPLETION OF
CERTAIN FACT DISCOVERY

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned
2 counsel, hereby stipulate and respectfully request that the Court extend the deadline for Plaintiffs
3 and Defendants Google, LLC and YouTube, LLC (“Defendants”) to complete certain fact
4 discovery.

5 WHEREAS, despite the parties’ best efforts and diligence to resolve all fact discovery
6 issues before the April 4, 2025 deadline, certain discovery issues will not be complete and/or ripe
7 for briefing by April 4, 2025. Accordingly, Plaintiffs and Defendants have mutually agreed to
8 schedule the following:

9 1. With respect to the completion of 30(b)(1) fact depositions, the parties agree to take
10 the final fact deposition witness, YouTube CEO Neal Mohan, on April 24, 2025.

11 2. With respect to the completion of 30(b)(6) testimony, oral and written, the parties
12 agree to the following:

13 a. Oral testimony on 30(b)(6) Topics IV.8 and VI.11 will occur remotely on a
14 mutually agreed upon date in the second week of April 2025.

15 b. Oral testimony on the final 30(b)(6) topic will occur on a date to be mutually
16 agreed upon by the Parties but no later than April 24, 2025.

17 c. Written responses to all remaining agreed upon 30(b)(6) topics will be provided
18 by Defendants no later than April 25, 2025.

19 3. To the extent there remains any dispute related to the above deposition testimonies
20 that are scheduled to take place and be produced after the fact discovery deadline, the
21 parties agree to hold an initial meet and confer no later than April 30, 2025, any necessary
22 H(2) no later than May 7, 2025, and any subsequent Joint Letter Brief filed no later than
23 May 14, 2025.

24 4. The parties agree that the requested extensions herein will not affect any other
25 deadline affixed by the Court.

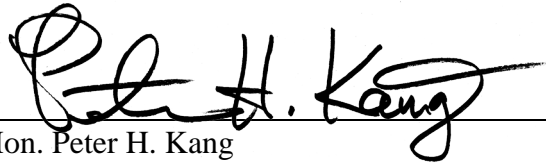
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1 **IT IS SO ORDERED**

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4 DATED: April 4, 2025



Hon. Peter H. Kang
United States Magistrate Judge

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8 DATED: April 4, 2025

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27 DATED: April 4, 2025

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Plaintiffs' Steering Committee Membership

Attorneys for Plaintiffs

ATTESTATION

I, Audrey Siegel, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: April 4, 2025

By: /s/ Audrey Siegel
Audrey Siegel